

TECHNICAL REVIEW DOCUMENT FOR RENEWAL OF OPERATING PERMIT 96OPAD172

to be issued to:

Sinclair Oil Corporation – Denver Products Terminal
Adams County
Source ID 00100019

Prepared by Cathy Rhodes
November, 2002

1. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued October 1, 1998 and expires on October 1, 2003. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted October 1, 2002. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

2. Source Description

This source is classified as a petroleum products terminal which falls into the Standard Industrial Classification 5171. Processes include fourteen (14) storage tanks for gasoline, fuel oil #1, fuel oil # 2, MTBE and ethanol. The facility also contains a tank truck loading rack, a railcar loading rack. Emissions from the tank truck loading rack, tank # 1 and tank # 14 are controlled with a flare.

The facility is located in Henderson. The Denver metro area is classified as attainment/maintenance for CO, PM₁₀ and Ozone. This facility is within 100 km of a Class I area, Rocky Mountain National Park but there are no other states within 50 miles. The applicant certified that they are not subject to the provisions of the Section 112(r) or the Federal Clean Air Act. The source category is subject to the Gas Distribution MACT. This source, however, received a synthetic minor permit which limits their HAPs to below major source level. They are therefore not subject to the Gas Distribution MACT.

Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (tpy)</u>	<u>Actuals (tpy)</u>
NOX	6.0	6
VOC	146.5	116
CO	15.1	15
HAPs (total)	< 25.0	4
HAPs (individual)	< 10.0	1

Potential emissions are permitted limits. Actual emissions estimates are based on the most recent APENs submitted to the Division.

3. Discussion of Modifications Made

Source Requested Modifications

The source requested the following changes to the permit in their renewal application:

Section II

Emission factors for some of the units have changed (new version of TANKS). The permit was revised to include updated emission factors. The emissions due to the new emission factors are still within the originally permitted facility wide emission limit, therefore the emission limit is not revised.

Subsequent to public notice and EPA review, but prior to permit issuance, the permittee requested a revision to Condition 3.2 to allow the transfer of petroleum liquids with vapor pressure lower than those permitted. This request qualifies as an Administrative Amendment, therefore it is included in the renewed permit.

Section III – Permit Shield

NSPS Subparts K, Ka, and Kb shields are added as applicable to the storage tanks.

Appendix A

The Insignificant Activities list is updated.

Other Modifications

In addition to the revisions the source requested to their permit in their renewal application, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit

processing decisions and EPA comments, to the Denver Products Terminal Operating Permit:

Page following Cover Page

A Note is added to the report dates, to indicate when the Division considers reports to have been received.

Section I

Condition 1.1 is revised to reflect the new attainment status for the area.

Condition 1.4 is split into two new conditions (1.4 and 1.5) and revised to reflect new Condition numbers for Section IV conditions.

Condition 3 is added to reflect the PSD status of the source. Subsequent conditions in Section 1 are renumbered.

Condition 4 is revised based on comments by the EPA on other operating permits. The phrase "Based on information provided by the applicant" is added to the beginning of Condition 4.

Condition 6 is added for compliance assurance monitoring provisions. The Tank Truck Loading Rack uses a flare to control emissions, and precontrolled emissions exceed the major source threshold, therefore this activity is subject to CAM requirements.

Section II

Language is added to all relevant conditions requiring records to be maintained for Division inspection upon request. This includes records of HAP constituents for permitted stored products (Condition 1.1.).

Conditions 1.2.1 and 2.2.2 are revised to reflect the Division's short term limit policy (daily requirements are removed – only monthly requirements apply).

The regulatory cite is added to Conditions 1.4.1 and 1.4.2. Clarifications regarding the applicability of III.A and III.B are added.

Condition 1.5 is revised to include all applicable Subpart K and Ka requirements.

Conditions 1.8, 2.9, and 3.4 – Language is added, per EPA comments on other Operating Permits, to require that the manufacturer's recommendations be in written form, and that good engineering practices be used.

The reference to monthly flare emissions is deleted from Condition 2.1.
The equation in Condition 2.1 is revised to clarify that NO_x and CO emission calculations are based on gasoline and oxygenate throughput.

Condition 2.5 is revised to clarify that “records of flare operation” means records of control efficiency as required in the CAM provisions of Condition 2.10.

Condition 2.7 is corrected to reference Condition 2.6 (not 2.5) for NSPS flare requirements. In addition, language is added to indicate the Division’s current policy regarding the length of an opacity violation. Language is added to require that the daily observation last at least five minutes.

Condition 2.10 is added to address CAM requirements for the Truck Loading Rack.

Condition 4.1.4 is revised to indicate that a component count shall be conducted at least once every five years.

Section III – Permit Shield

The Title for Condition 1 is changed from “Specific Conditions” to “Specific Non-Applicable Requirements.”

Based on comments made by the EPA on another permit, the following statements were added after the introductory sentence in Condition 1. “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.”

Based on comments made by the EPA on another permit, the following phrase is added to the beginning of the Condition 1 introductory sentence. “Based upon the information available to the Division and supplied by the applicant...”

Section IV – General Conditions

Add Common Provisions requirements as Condition 3. (All subsequent conditions are renumbered)

Insert “and” between the Regulation No. 2 and the C.R.S. citations in Condition 4.

Update the Open Burning Regulation cite for Condition 17.

Appendices

First Page of Appendices – The titles of Appendices B and C are revised. The phrase “except as otherwise provided in the permit” is added after the word “enforceable” in the disclaimer at the request of the EPA.

Appendices B and C are replaced with the Division’s current reporting formats.

The EPA addresses in Appendix D are updated.